

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER ECKHART and CATHY AREU,

Plaintiffs,

Civil Case No. 1:20-cv-05593

against

FOX NEWS NETWORK, LLC, ED HENRY,  
SEAN HANNITY, TUCKER CARLSON and  
HOWARD KURTZ, in their individual and  
professional capacities,

Defendants.  
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**AFFIDAVIT OF TIFFANY FAZIO IN SUPPORT OF  
DEFENDANTS' RULE 11 MOTION FOR SANCTIONS**

I, Tiffany Fazio, declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Executive Producer of *Hannity*, which airs on the Fox News Channel Mondays through Fridays from 9 p.m. to 10 p.m. Eastern Time. I have been an Executive Producer of *Hannity* since July 2017.
2. I reviewed the transcripts for all episodes of *Hannity* for the period of 2009 through the present and can confirm that Cathy Areu appeared as a guest on *Hannity* on the following dates:

- March 3, 2009
- March 4, 2011
- January 10, 2018
- March 1, 2018
- March 8, 2018
- March 13, 2018

- March 26, 2018
- April 4, 2018
- June 7, 2018
- July 5, 2018
- December 3, 2018
- December 10, 2018
- June 4, 2019
- July 3, 2019

3. On March 8, 2018, I produced *Hannity* from a control room which allowed me to see everything that occurred on camera and to hear sound picked up through the microphones placed on Mr. Hannity and his guests. Cathy Areu was a guest on the program that night, and she brought with her into the studio a man I did not know. Visitors to the *Hannity* studio typically stand behind the camera and crew so they remain out of the camera shot. During a break between segments while Ms. Areu was on the set, I saw Mr. Hannity look out towards the area of the camera and crew and heard him ask something to the effect: “Are you with Cathy?” or “How do you know Cathy?” in an apparent effort to identify and acquaint himself with the man who had accompanied Ms. Areu to the studio. There was some further back and forth between Ms. Areu and Mr. Hannity – and possibly the man she brought with her, although I do not recall hearing him say anything. Ms. Areu seemed evasive about the nature of their relationship to one another, and at some point Mr. Hannity asked Ms. Areu and the man if they were “dating.” Mr. Hannity then told them that they should go out for drinks at Del Frisco’s, a nearby restaurant, and that it would be his treat.
4. At no time did Ms. Areu appear “humiliat[ed],” as she has alleged in her Complaint.
5. At no time did I hear Mr. Hannity do or say anything to “auction off” Ms. Areu, nor did he say anything remotely “misogynistic” or harassing to or about her.

6. Moreover, at no time did I hear Mr. Hannity “offer” a “stack of cash” to his “male staff, auctioning off Ms. Areu to anyone in the studio was ‘man enough’ to take her on a date after work,” as alleged by Michael Willemmin, in a July 20, 2020 email to the Wigdor Firm’s “press list.” Nor did I hear Mr. Hannity harass Ms. Areu, sexually or otherwise, as Mr. Willemmin has stated.
7. After the show, I went to the green room. Ms. Areu and her male companion were in the green room when I arrived. A few minutes later, Mr. Hannity joined us in the green room, and we all chatted. Ms. Areu thanked Mr. Hannity for having her on the show and they discussed Ms. Areu and her friend going to Del Frisco’s for drinks on Mr. Hannity.

Dated: 9/25/2020

By: Tiffany Fazio  
Tiffany Fazio